

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOHN DOE,

15-CV-07267 (JMA) (ARL)

Plaintiff,

**STIPULATION AND
ORDER**

-against-

MICROSOFT CORPORATION,

Defendant.

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WHEREAS, Plaintiff filed this action alleging violations of the Americans with Disabilities Act (“ADA”), 42 U.S.C. §12101 et seq. and the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law §290 et seq. under a pseudonym;

WHEREAS, the Complaint alleges that Plaintiff underwent a radical orchiectomy (surgical removal of a testicle), suffered scrotal infections, experienced chronic testicular pain, and was treated for low testosterone;

WHEREAS, Plaintiff has represented that this litigation will involve matters of a highly sensitive and personal nature, require disclosure of information of the utmost intimacy, and will challenge the conduct of only private parties;

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the parties:

1. The identity of Plaintiff will be treated as confidential by the parties during the discovery phase of this litigation.
2. Information indicating Plaintiff's identity, including, but not limited to, Plaintiff's name and date of birth will not be withheld from Defendant.

3. In an electronic or paper filing with the Court that contains Plaintiff's name, including, but not limited to, deposition transcripts and medical records, a party making the filing will redact the Plaintiff's name.

4. Nothing contained herein requires a party that makes a filing that contains Plaintiff's name to make such filing under seal.

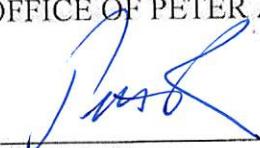
5. Within a reasonable period of time after the conclusion of this litigation, all material that indicates Plaintiff's identity will be destroyed by the parties.

6. This Stipulation shall not be construed as a waiver of any rights, arguments, or position of the Defendant.

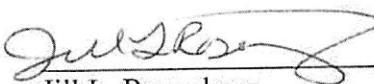
Date: March 21, 2016

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SO ORDERED:

United States District Judge